IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

NATIONAL INDOOR FOOTBALL :

LEAGUE L.L.C., : CIVIL DIVISION

Plaintiff : **NO. CA 2 - 548**

:

v. : TYPE OF PLEADING:

Plaintiff's Proposed Voir Dire

R.P.C. EMPLOYER SERVICES, INC.,

and DAN J. D'ALIO,

JURY TRIAL DEMANDED

Defendants.

:

FILED ON BEHALF OF:

:

Plaintiff

:

COUNSEL FOR PLAINTIFF:

.

: TIMOTHY C. LEVENTRY, LL.M

LEVENTRY, HASCHAK

: & RODKEY, LLC

: 1397 EISENHOWER BOULEVARD : RICHLAND SQUARE III, SUITE 202

: JOHNSTOWN, PA 15904

: (814) 266-1799

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and DAN J. D'ALIO,

:

Defendants.

PLAINTIFF'S PROPOSED VOIR DIRE

Plaintiff, National Indoor Football League, L.L.C., by and through its attorneys, Leventry, Haschak, & Rodkey, LLC, hereby submits the following Proposed Voir Dire Questions. <u>In addition</u> to the Court's usual introductory comments and standard voir dire questions, NIFL respectfully requests that the Court ask the following questions of the venire.

PROPOSED VOIR DIRE

- 1. Do you, or does any member of your family work for or have a financial interest in or with any party to this action?
 - 2. Have you ever been denied insurance coverage for any reason?
- 3. Have you or anyone close to you ever worked as a police officer or had any other job involving law enforcement? In addition to being a police officer, this would include being a private detective or investigator, security guard, prison guard, district attorney or other prosecutor, public defender, or criminal defense lawyer.

- 4. Have you or anyone close to you ever been a victim of a crime?
- 5. Have you or a member of your family ever been charged, arrested, or convicted of a crime other than a minor traffic violation?
 - 6. What is your occupation and how long have you worked in that capacity?
- 7. Do you have any strong feelings about the case that would make you unable to serve as a fair and impartial juror?
- 8. The Plaintiffs agree with the Voir Dire questions proposed by the Defendants except for questions 24 and 25.

Respectfully submitted,

s/ Timothy C. Leventry
Timothy C. Leventry, LL.M
Attorney for the Plaintiff

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R.P.C. EMPLOYER SERVICES, INC.,

and DAN J. D'ALIO, :

:

Defendants.

CERTIFICATE OF SERVICE

I, Timothy C. Leventry, do hereby certify that a true and correct copy of the foregoing Plaintiff's Proposed Voir Dire was served on the parties listed below by **regular mail, email or fax**:

Michael J. Seymour, Esq. Feczko and Seymour 520 Grant Building 310 Grant Street Pittsburgh, PA 15219

Bernard C. Caputo, Esq. Fort Pitt Commons Building, Suite 260 445 Fort Pitt Boulevard Pittsburgh, Pennsylvania 15219

LEVENTRY, HASCHAK, & RODKEY, LLC

Dated:	3-20-06	By: s/ Timothy C. Leventry
		Timothy C. Leventry, Esquire